



Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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February 20, 2015

Via Electronic Mail Only

Ms. Joshua Palmer
Water Resources Control Engineer
Regional Water Quality Control Board,
Central Valley Region
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670
joshua.palmer@waterboards.ca.gov

RE: Comments on the Tentative Waste Discharge Requirements for Nevada County
Sanitation District No. 1, Lake Wildwood Wastewater Treatment Plant, Nevada County

Dear Mr. Palmer:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to comment on the tentative Waste Discharge Requirements for the Nevada County Sanitation District No. 1 (District), Lake Wildwood Wastewater Treatment Plant (Tentative Order). CVCWA is a non-profit association of public agencies located within the Central Valley region that provide wastewater collection, treatment, and water recycling services to millions of Central Valley residents and businesses. We approach these matters with the perspective of balancing environmental and economic interests consistent with state and federal law. In this letter, we provide the following comment regarding the language for the salinity evaluation and minimization plan requirement.

The Tentative Order requires the District to update and continue to implement a salinity evaluation and minimization plan. The updated plan must be submitted within 9 months of the adoption of the permit, with annual reports due thereafter. The Tentative Order states that the

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“Discharger shall provide annual reports demonstrating the reasonable progress in the reduction of salinity in its discharge to Deer Creek.” (Tentative Order at pp. 13-14.)

CVCWA respectfully requests that this language be revised to state: “The Discharger shall provide annual reports demonstrating the reasonable progress in the implementation of the salinity evaluation and minimization plan ~~reduction of salinity in its discharge to Deer Creek.~~” The former language implies that the District must show reductions in salinity in order to comply with the minimization plan requirement. CVCWA does not believe this is what the Central Valley Regional Water Quality Control Board intended by requiring the submission of annual reports. Rather, the salinity plan is a tool to identify sources of salinity from the treatment plant or in the community and develop measures to address the sources of salinity. The annual report should demonstrate that the District is continuing to implement those measures. CVCWA’s requested language is more tailored to this goal.

We appreciate your consideration of these comments. If you have any questions or if CVCWA can be of further assistance, please contact me at (530) 268-1338 or eoofficer@cvcwa.org.

Sincerely,



Debbie Webster,
Executive Officer

cc (via email): Pamela Creedon, Central Valley Regional Water Quality Control Board
(pcreedon@waterboards.ca.gov)